

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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	:	
UNITED STATES OF AMERICA	:	
	:	
- v. -	:	GOVERNMENT’S FORFEITURE
	:	<u>BILL OF PARTICULARS</u>
RICHARD GAFFEY,	:	
a/k/a “Dick Gaffey,” and	:	S6 18 Cr. 693 (RMB)
HARALD JOACHIM VON DER GOLTZ	:	
a/k/a “H.J. von der Goltz,”	:	
a/k/a “Johan von der Goltz,”	:	
a/k/a “Jochen von der Goltz,”	:	
a/k/a “Tica,”	:	
a/k/a “Tika,”	:	
	:	
Defendants.	:	
	:	
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Pursuant to United States v. Grammatikos, 633 F.2d 1013, 1024 (2d Cir. 1980), the Government respectfully gives notice that the property subject to forfeiture as a result of the offenses alleged in Counts Two and Three of the Indictment, as alleged in the Forfeiture Allegations and/or the Substitute Assets Provision in the Indictment, includes but is not limited to the following:

- a) Any and all assets, wherever they may be located, held in the name of Revack Holdings Foundation;
- b) Any and all assets, wherever they may be located, held in the name of EMJO Investments Limited, including but not limited to:
  - i. Any and all funds formerly on deposit in First Republic Bank Account Number 966-0070-3479, held in the name of EMJO Investments Limited;
  - ii. Any and all funds formerly on deposit in First Republic Bank Account Number 50019044473, held in the name of EMJO Investments Limited;

- iii. Any and all funds formerly on deposit in First Republic Bank Account Number 50019047005, held in the name of EMJO Investments Limited;
  - iv. Any and all funds or assets held in investment accounts by Brooke Private Equity Associates and any funds administered by or associated with Brooke Private Equity Associates in the name of EMJO Investments, Ltd.;
- c) Any and all assets, wherever they may be located, held in the name of Union Properties Inc., including but not limited to:
  - i. Any and all funds formerly on deposit in Credit Suisse Bank Account Number 2G5-002657, held in the name of Union Properties, Inc.;
- d) Any and all assets, wherever they may be located, held in the name of Worldwide Investment Services and Holdings, Ltd.;
- e) Any and all funds on deposit in First Republic Bank Account Number ending in 0098, held in the names of Harald Joachim Von Der Goltz and Belle Von Der Goltz;
- f) Any and all funds on deposit in First Republic Bank Account Number ending in 0534, held in the names of Harald Joachim Von Der Goltz and Belle Von Der Goltz;
- g) All that lot or parcel of land, together with its building, appurtenances, improvements, fixtures, attachments and easements, located at 590 Charles River Street, Needham, Massachusetts 02492, held in the name of Robert K. Hamshaw, Wolfgang Traber, and Richard Gaffey, as Trustees of the Harald Joachim Von Der Goltz Children's Trust;
- h) All that lot or parcel of land, together with its building, appurtenances, improvements, fixtures, attachments and easements, located at 177 Ocean Lane Drive, Key Biscayne, Florida 33149, held in the name of Robert K. Hamshaw, Wolfgang Traber, and Richard Gaffey, as Trustees of the Harald Joachim Von Der Goltz Children's Trust; and
- i) The painting known as "Regates a Henley," by the artist Raoul Dufy.

Dated: New York, New York  
December 19, 2019

Respectfully Submitted,

GEOFFREY S. BERMAN  
United States Attorney for the  
Southern District of New York

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